



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

5636 Southern Boulevard
Virginia Beach, VA 23462
Tel# (757) 518-2000
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Dennis H. Treacy
Director

Francis L. Daniel
Tidewater Regional Director

October 15, 1998

Mr. Van H. White
Manager of Environmental Affairs
Huntsman Chemical Corporation
5100 Bainbridge Boulevard
Chesapeake, Virginia 23320-6502

**Re: EPA ID# VAD086302866
Huntsman Chemical Corporation
5100 Bainbridge Boulevard
Chesapeake**

Dear Mr. White:

This office has received your letter dated September 18, 1998 and your facsimile dated October 13, 1998, addressing violations and areas of concern during the RCRA Hazardous Waste Compliance Inspection performed on September 10, 1998. The corrective actions indicated in your letter are acceptable in bringing the referenced facility back into compliance with the Virginia Hazardous Waste Management Regulations 9 VAC 20-60 *et seq.* Compliance may be verified by on-site inspection or other appropriate means.

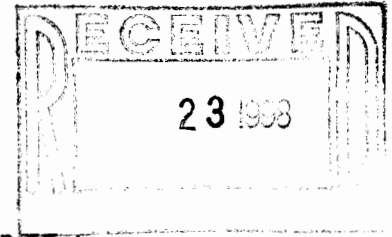
If you have any questions regarding this matter, please contact me at (757) 518-2188.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lora B. Fly".

Lora B. Fly
Enforcement Compliance Specialist, Sr.

c: Claire Ballard, DEQ,OTA
File



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Letter of Noncompliance

September 22, 1998

Mr. Van H. White
Manager of Environmental Affairs
Huntsman Chemical Corporation
5100 Bainbridge Boulevard
Chesapeake, Virginia 23320-6502

**Re: EPA ID# VAD086302866
Huntsman Chemical Corporation
5100 Bainbridge Boulevard
Chesapeake**

Dear Mr. White:

On September 10, 1998, I conducted a RCRA Hazardous Waste Compliance Inspection at the referenced facility. The facility is classified as a LARGE QUANTITY GENERATOR in the EPA's database. As a result of this inspection the facility will be reclassified as a **SMALL QUANTITY GENERATOR**. Based on the information obtained during the inspection, some items were not in compliance with the applicable requirements of the Virginia Hazardous Waste Management Regulations (VHWMR) 9 VAC 20-60 *et seq.* The violations are also described in the enclosed inspection checklists.

1. The facility did not file an exception report with the Director of DEQ for manifest number 43771. The initial transporter removed the waste on March 21, 1998. Section 9 VAC 20-60-380.C.2 (previously §6.5.C.2) of the VHWMR requires the facility submit an "Exception Report to the Director if the facility has not received a copy of the manifest with the handwritten signature of the authorized representative of the designated facility within 60 days of the date the waste was accepted by the initial transporter." Before the inspection concluded, the facility gave the Department a signed copy of this manifest from the designated facility.

Mr. Van H. White
September 22, 1998
Page 2 of 2

within 60 days of the date the waste was accepted by the initial transporter." Before the inspection concluded, the facility gave the Department a signed copy of this manifest from the designated facility.

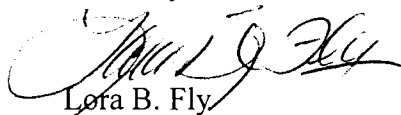
2. The following weekly inspections of the less than 270-day accumulation area (270-day area) were not documented as required in section 9 VAC 20-60-600.E (formerly §9.8.E) of the VHWMR: January 12-18, 1998, February 16-22, 1988, March 9-15, 1998, July 13-19, 1998. In addition the inspection sheet for August 4, 1998 was missing. Copies of the weekly logs were found February, March and August before the inspection concluded. Only informal inspections were done in January and July.

As a generator, inspections of the 270-day area must be maintained in an inspection log, according to section 9 VAC 20-60-530.F.4 (previously §9.1.F.4) of the VHWMR. This log must be kept for at least three years from the date of the inspection.

Within **30 days** of receipt of this letter submit a written explanation of corrective actions your facility intends to take or has taken to correct the identified compliance deficiency. Please include a time schedule for these corrective actions and any supporting documentation to the corrective actions taken. Your letter will assist our staff in maintaining a complete and accurate record of the compliance status of your facility. Compliance may be verified by on-site inspection or other appropriate means. Failure to respond may result in enforcement action by the Department.

This Letter of Noncompliance is not an agency proceeding or determination which may be considered a case decision under the Virginia Administrative Process Act, Va. Code §9-6.14:1 *et seq.* Please contact me at (757) 518-2188 if you have any questions about the content of this letter or need additional guidance in achieving or maintaining compliance.

Sincerely,



Lora B. Fly
Enforcement Compliance Specialist, Sr.

Enclosure

c: Claire Ballard, DEQ,OTA
File

DEPARTMENT OF ENVIRONMENTAL QUALITY

SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: Huntsman Chemical Corporation

ADDRESS: 5100 Bainbridge Boulevard
Chesapeake, Virginia 23320

EPA ID NUMBER: VAD086302866

FACILITY
REPRESENTATIVE: Van H. White and Omer Cormier

TITLE: Manager of Environmental Affairs & Environmental Specialist

TELEPHONE NUMBER: (757) 494-2740 and (757) 494-2790

INSPECTOR'S NAME: Lora B. Fly

TITLE: Enforcement Compliance Specialist, Sr.

DATE of INSPECTION: September 10, 1998

-
1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Manufactures styrene resins into polymerized polystyrene pellets

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

D001 -	Styrene and Styrene monomer
D002, F002, F005 -	Methylene Chloride, Chloroform
D001, D035, F003, F005 -	Tetrahydrofuran, Acetonitrile

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

<u>Waste Code</u>	<u>Amount Generated</u>	<u>Amount Accumulated</u>
D001	540 gals	540 gals
D002,F002,F005	315 gals	315 gals
D001,D035,F003		
F005	120 gals	120 gals

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? NO
If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

TRANSPORTERS

Tristate Motor Transit Co.	MOD095038998
Safeway Chemical Transport Inc.	DER000000273

DISPOSAL FACILITY

RINECO	Benton, AR	ARD981057870
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6. Does the facility generate any hazardous waste that is excluded from regulation? If **yes**, list the waste and the basis for exclusion. NO

7. Does the facility:

Generate	Market	Burn
-----------------	---------------	-------------

used oil that is burned for energy recovery? **Underline** or **circle all that are applicable.** (If the facility

markets or burns used oil, fill out the
Used Oil Checklist.)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist.**

NO

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist.**

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If **yes**, Underline or circle all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist.**

NO

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain _____

[Underline or **Circle** All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

<u>Location</u>	<u>Number of Containers</u>	<u>Number of Tanks</u>	<u>Capacity</u>
SAAs			
Maintenance Area	1	0	55-gals
R&D			
Rm 201	2	0	3-gals
Rm 202	1	0	5-gals
Rm 203	1	0	1-gal
Rm 204	1	0	2.5-gals
Rm 207	2	0	2.5-gals
Rm 208	2	0	5-gals
Rm 211	1	0	2.5-gals
< 270-days			
Outside Shed	8	0	55-gals

13. Comments:

The facility changed from a large quantity generator to a small quantity generator approximately 8 years ago. The RCRIS data base still lists the facility as a large. This inspection will change the facility to the proper status.

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

DEPARTMENT OF ENVIRONMENTAL QUALITY

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF SMALL QUANTITY GENERATORS (SQG)

FACILITY NAME: Huntsman Chemical Corporation

EPA ID NUMBER: VAD086302866

INSPECTION DATE: September 10, 1998

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.4.a.	1. Does the generator ever accumulate a quantity of hazardous waste greater than 6,000 kilograms? (If <u>YES</u> , then use <u>LOG</u> or <u>UNAUTHORIZED FACILITY Checklist</u> .)		X	
6.4.E.4. 6.4.E.5. 6.4.E.6. 6.4.E.4.c. 9.9.L.	2. Does the small quantity generator accumulate hazardous waste for greater than 180 days (or 270 days if the disposal facility is greater than 200 miles away)? (If <u>YES</u> , then use <u>UNAUTHORIZED FACILITY Checklist</u> .) (If the SQG accumulates in TANKS , complete the SQG Tank Section, Items 23 through 25.)		X	
6.4.E.4.d. 9.2.B.1.	3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel? Alarm system	X		
6.4.E.4.d. 9.2.B.2.	4. Does the generator have a device such as a telephone or two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or Commonwealth or local emergency response teams? Telephone	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.4.d. 9.2.B.3.	5. Does the facility have portable fire extinguishers, fire control equipment, and decontamination equipment?	X		
6.4.E.4.d. 9.2.B.4.	6. Is there water at adequate volume and pressure to supply expected fire demands?	X		
6.4.E.4.d. 9.2.C.	7. Does the facility test and maintain the equipment in the previous four questions as necessary to assure proper operation?	X		
6.4.E.4.d. 9.2.C.	8. Is a log maintained of these inspections? Tags on fire extinguishers	X		
6.4.E.4.d. 9.2.E.	9. Is there adequate aisle space to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment to any area of the facility?	X		
6.4.E.4.d. 9.2.F.	10. Has the facility attempted to arrange agreements with the local authorities such that:			
6.4.E.4.d. 9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?	X		
6.4.E.4.d. 9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, the agreements specify a primary emergency authority?			X
6.4.E.4.d. 9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
6.4.E.4.d. 9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		
6.4.E.4.e.(1)	11. Is there at least one employee either on the premises or on call at all times with the responsibility for coordinating all emergency response measures? (Emergency coordinator) NAME: Van H. White TITLE: Manager of Environmental Affairs	X		
6.4.E.4.e.(2)	12. Is the following posted next to the facility telephone:			
6.4.E.4.e. (2)(a)	A. The name and telephone number of the emergency coordinator?	X		
6.4.E.4.e. (2)(b)	B. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? and	X		
6.4.E.4.e. (2)(c)	C. The telephone number of the fire department (if no direct fire alarm)?	X		
5.B. 5.C.	13. Does the small quantity generator use a manifest to ship wastes off-site? If NO , go to Item # 18. If YES , continue.	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.2.C.	14. Has the generator determined that the facility has an EPA ID number? (NOTE: Shipments to POTWs must be manifested, if transported by a vehicle and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.)	X		
5.5.A.7.	15. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?	X		
6.3. 5.3.B.1.	16. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to this manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number(UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		
5.3.C.	H. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."	X		
6.5.C.2.	17. Exception reporting: If the generator (SQG) has not received a copy of a manifest signed by facility within 60 days of initial transporter, did he submit a legible copy of manifest with an indication of not receiving a confirmation of delivery, to the Director?		*	

PART/ SECTION	REGULATION	YES	NO	N/A
5.C.	18. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? If YES,		X	
5.C.1.a.	A. Are the type of waste and frequency of reclamation shipments specified in the agreement?			X
5.C.1.b.	B. Is the vehicle used to transport the waste to the recycling facility and to deliver material back to the generator owned and operated by the reclaimer? and			X
5.C.2.	C. Does the small quantity generator maintain a copy of the agreement in his files for at least three years after termination or expiration of the agreement?			X
6.5.A.1.3. 15.1.G.1.a.	19. Does the generator retain copies of all manifests, test results and waste analyses for at least three years? Land Disposal Restriction Form should be retained for at least five years.	X		
6.4.E.4.e.(3)	20. Does the generator ensure all employees are thoroughly familiar with proper waste handling and emergency procedures?	X		
6.5.D.	21. Has the generator ever submitted a release report if responsible for release of Hazardous Substance which threatens public health? (Must notify NRC, Local Government, the Department.) 2000-gal styrene monomer spill on 9/18/87	X		
6.4.E.4.b. 9.8.	22. Use and Management of Containers for 180 day accumulation areas: (270 days if TSF is over 200 miles away.)			
9.8.B.	A. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?	X		
9.8.C.	B. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.4.d. 6.4.E.1.b.	C. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	X		
6.4.E.4.d. 6.4.E.1.c.	D. Is the container labeled or marked clearly with the words "Hazardous Waste"?	X		
9.8.D.1.	E. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste?	X		
9.8.E.	F. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?		*	
9.8.G.1.	G. Are incompatible wastes placed in separate containers? and	X		

PART/ SECTION	REGULATION	YES	NO	N/A
9.8.G.3.	H. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	I. Does the generator have satellite accumulation areas where up to 55 gal of any one type of Hazardous Waste (HW) (1 qt acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.	1. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		
6.4.E.3.a.(1) 9.8.B.	2. Are the containers in good condition?	X		
6.4.E.3.a.(1) 9.8.C.	3. Are the containers compatible with the waste?	X		
6.4.E.3.a.(1) 9.8.D.1.	4. Are the containers kept closed except as necessary to add or remove waste? and	X		
6.4.E.3.a.(2)	5. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	X		
6.4.E.3.b.	J. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
	1. Has the generator marked the excess amount with the date the excess amount began accumulating? and			X
	2. Has the generator either removed the excess amount within three days of the date of excess accumulation or has he complied with all other provisions for accumulation areas. Namely, has he notified the Executive Director about the location of the accumulation area?			X
9.9.L.	23. Does the small quantity generator accumulate in tanks? If YES, describe Tank System in the COMMENT Section.		X	
9.9.L.2.c.	A. If the TANK is uncovered, is there at least 2 feet of freeboard or a system with the capacity to hold the volume equivalent to 2 feet of freeboard? Describe the System in the COMMENT Section.			X
9.9.L.2.d.	B. If the TANK is fed continuously, is there a waste feed cutoff system or by-pass system? Describe the System in the COMMENT Section.			X
9.9.L.3.	C. Does the Small Quantity Generator (SQG) inspect the following at least once each operating day:			
9.9.L.3.a.	1. Discharge control equipment?			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.L.3.b.	2. Data gathered from monitoring equipment?			X
9.9.L.3.c.	3. The level of waste in the Tanks?			X
9.9.L.3.d.	D. Does the SQG inspect the following at least weekly:			
9.9.L.3.d	1. The construction materials of the Tanks for corrosion or leaking?			X
9.9.L.3.e.	2. The area immediately surrounding the discharge confinement system for leaks?			X
9.9.L.5.	E. If ignitable or reactive waste are generated, is the waste:			X
9.9.L.5.a.(1)	1. treated, rendered, or mixed before or immediately after placement so that the waste is no longer ignitable or reactive; or			X
9.9.L.5.a.(2)	2. protected from any material or conditions that may cause the waste to ignite or react; or			X
9.9.L.5.a.(3)	3. is the Tank used only for emergencies?			X
9.9.L.5.b.	F. If the Tank is covered and manages ignitable or reactive waste, are the buffer zones for the National Fire Protection Association codes met? List the required and actual distances: Required Actual _____			X
9.9.L.6	G. Are incompatible waste placed in the same tank? If YES,			X
	Is the tank cleaned prior to placing the incompatible waste in the Tank?			X
6.4.E.4.d	24. Is the Tank clearly marked with the words "Hazardous Waste"?			X
	25. PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".			
15.1.A.2.	26. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".			X
15.1.G.1.a.	27. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?			X
	28. Did the notification include the following information:			

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.a. (1)	A. EPA Hazardous Waste Number?			X
15.1.G.1.a. (2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.c.?			X
15.1.G.1.a. (3)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1.a. (4)	D. Waste analysis data, where available?			X
15.1.A.3.	29. Is land disposal of wastes occurring? If Yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.A.5.a.	30. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste per month? If so, the wastes are not subject to any provision of Part XV.		X	
15.1.E.	31. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X	
6.4.E.7., 6.4.E.4.d., 15.1.G.1.d.	32. Is the SQG treating waste in Tanks or Containers in order to meet applicable treatment standards under VHWMR § 15.4?		X	
15.1.G.1.d.	33. If Yes, has the SQG developed a Waste Analysis Plan?			X
15.1.G.1.d. (2)	34. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?			X
15.1.F.	35. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	
15.1.C.1.	36. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.D.1.	37. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	38. If Yes , does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of § 15.1.D.1.C. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted waste. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.b.	39. For restricted wastes which the generator has determined can be land disposed without further treatment , has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	40. Did the notification include the following information:			
15.1.G.1.b. (1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1.b. (1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.b. (1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1.b. (1)(d)	D. Waste analysis date, where available?			X
15.1.G.1.b.2.	41. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	42. Have restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X
15.1.G.1.g.	43. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	44. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	45. If Yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

COMMENTS

- Item 17 The facility did not received a signed copy of manifest #43771 from the disposal faciltiy within 60 days as required in Section§6.5.C.2 of the VHWMR.
- Item 22F Weekly inspections of the 270-day accumulation area were missing. Section §9.8 of the VHWMR required inspections of the 270-day area be conducted at least weekly.



Department of Pollution Control and Ecology
P.O. Box 9913 Little Rock, Arkansas 72219-9913
Telephone 501-642-6744
Form Approved OMB No. 3045-0046

Please print or type (Name should be typed on site (12-plate) (optional))

UNIFORM HAZARDOUS WASTE MANIFEST		VAD086302866 83773		Form Approved OMB No. 3045-0046	
1. Generator's Name and Address Huntman Chemical Corporation 5100 Maplebridge Blvd. Chesapeake, VA 23320-6502 757-454-2740		2. Manifest Number AR-943773		3. Date of Manifest 09/15/98	
4. Transporter's Name and Address Tri-State Motor Transit Co. MOD095038998		5. Date of Transport 09/15/98		6. Date of Receipt 09/15/98	
7. Receiver's Name and Address RINECO 1087 Vulcan Rd. Haskett Birmingham, AL 35204 ABD981057470		8. Date of Receipt 09/17/98		9. Date of Disposal 09/17/98	
10. Description of Waste (including proper shipping name, hazard class, and quantity)		11. Quantity		12. Weight	
Waste Flammable Liquid, N.O.E. (Hydrazine)		3 DM		5.40 G	
Non Regulated Material (O.S. Ivory Pigment Dispersion)		4 DM		2.20 G	
Non Regulated Material (Contaminated Oil)		0 DM		G	
13. Signature of Generator Van H White		14. Signature of Transporter David M. Wundon		15. Signature of Receiver David M. Wundon	
16. Date of Signature 09/15/98		17. Date of Signature 09/15/98		18. Date of Signature 09/17/98	
19. Date of Signature 09/15/98		20. Date of Signature 09/15/98		21. Date of Signature 09/17/98	
22. Date of Signature 09/15/98		23. Date of Signature 09/15/98		24. Date of Signature 09/17/98	
25. Date of Signature 09/15/98		26. Date of Signature 09/15/98		27. Date of Signature 09/17/98	
28. Date of Signature 09/15/98		29. Date of Signature 09/15/98		30. Date of Signature 09/17/98	
31. Date of Signature 09/15/98		32. Date of Signature 09/15/98		33. Date of Signature 09/17/98	
34. Date of Signature 09/15/98		35. Date of Signature 09/15/98		36. Date of Signature 09/17/98	
37. Date of Signature 09/15/98		38. Date of Signature 09/15/98		39. Date of Signature 09/17/98	
40. Date of Signature 09/15/98		41. Date of Signature 09/15/98		42. Date of Signature 09/17/98	
43. Date of Signature 09/15/98		44. Date of Signature 09/15/98		45. Date of Signature 09/17/98	
46. Date of Signature 09/15/98		47. Date of Signature 09/15/98		48. Date of Signature 09/17/98	
49. Date of Signature 09/15/98		50. Date of Signature 09/15/98		51. Date of Signature 09/17/98	
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82. Date of Signature 09/15/98		83. Date of Signature 09/15/98		84. Date of Signature 09/17/98	
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88. Date of Signature 09/15/98		89. Date of Signature 09/15/98		90. Date of Signature 09/17/98	
91. Date of Signature 09/15/98		92. Date of Signature 09/15/98		93. Date of Signature 09/17/98	
94. Date of Signature 09/15/98		95. Date of Signature 09/15/98		96. Date of Signature 09/17/98	
97. Date of Signature 09/15/98		98. Date of Signature 09/15/98		99. Date of Signature 09/17/98	
100. Date of Signature 09/15/98		101. Date of Signature 09/15/98		102. Date of Signature 09/17/98	

TREATMENT/STORAGE/RESPIRATORY FACILITY CONT.



STATE OF ARKANSAS
Department of Pollution Control and Ecology
P.O. Box 2012 Little Rock, Arkansas 72219-2012
Telephone 501-682-0744

NO. 449 P.2/2

4

UNIFORM HAZARDOUS WASTE MANIFEST		VAD0004302866		53777	
1. Generator's Name Huntsman Chemical Corporation 5100 Mainbridge Blvd. Chesapeake, VA 22330-6902 757-484-2740		2. Shipper's Name Tri-State Motor Transport Co. MOD000503892A		3. EPA ID Number AR 943771	
4. Consignee's Name BINECO 1807 Vulcan Rd. Hanksville Benton, AR 72816		5. EPA ID Number ARD001057870		6. EPA ID Number 301772-2003	
7. Waste Description (Including Proper Shipping Name, Hazard Class and ID Number)		8. Quantity		9. Unit	
Waste Flammable Liquid, Corrosive, N.O.S. (Methylene Chloride / Chloroform) 3 UN1204 PGIII		50 G		DM	
Waste Flammable Liquid, N.O.S. (Hydrogen Peroxide) 3 UN1903 PGIII RQ (2001) (S) 100 lbs		45 G		DM	
Waste Flammable Liquid, N.O.S. (Tetrahydrofuran, Acetone) 3 UN1903 PGIII RQ (Carbon Dioxide) (S) 100 lbs		45 G		DM	
Non-Hazardous Material (Fume Scrubber Sludge)		45 G		DM	
10. Generator's Certification: I hereby declare that the contents of this document are fully and accurately described above by proper shipping name and are classified, packaged, labeled, and loaded/unloaded, and are in all respects in proper condition for transport by highway according to applicable regulations and national government requirements.		11. Signature of Generator Van White			
12. Signature of Shipper D. F. White		13. Signature of Consignee D. F. White			
14. Signature of Receiver D. F. White		15. Signature of Driver D. F. White			
16. Signature of Owner D. F. White		17. Signature of Carrier D. F. White			

Inspector name: OMER CORNIEPDate Inspected (Tuesdays): 2/17/98 Time: 0845 (am) Lpm

DESCRIPTION of DRUM	LAB'D	DATE STARTED	TYPE OF WASTE	CLOSED (Y/N) if open, CLOSE IN	AMT.	CONDITION/COMMENTS	Est. WT. (lbs.)
BLACK STEAR	YES	10/24/97	NON HAZ	YES	3/4		342
POLYETHYLENE	YES	10/28/97	HALOGRATED	YES	3/4		340
Maintenance	YES		aerosol can resid	YES	1/4		5
Quality Control lab	YES			YES			13
R & D Labs (all)	YES			YES	5500	+ 1 DRUM	453
Subtotal pounds							1153
ONLY COMPLETE THIS SECTION ON THE FIRST TUESDAY OF EACH MONTH.							
Less subtotal from first Tuesday of last month							
Equals (net increase in hazardous waste)							
Is This greater than 2,200 pounds (Y/N)?							

* What is the earliest date? 10/24/97 Date to call for hazardous waste pickup (six months later) APRIL

GENERAL INSPECTION SCHEDULE & LOG

1. Types of problems to look for, which may harm human health or the environment:

- A. Malfunctions
B. Deterioration
C. Operator Errors
D. Discharges

2. Inspection observations:

- A. Monitoring Equipment

- B. Safety Equipment
rubber gloves ✓
face shield ✓
grounding wires ✓
warning/caution signs ✓

- C. Emergency Equipment
fire extinguisher ✓
eye wash bottles ✓
Spill Attack Pack ✓

- D. Security Devices
fence/lock ✓

- E. Operating Equipment

- spring-loaded funnel ✓
spark-proof bung wrench ✓
bucket ✓
dip stick ✓
inside light ✓
Ventilator turbine ✓

- F. Structural Equipment

- cabinet floor, doors, walls
- ✓

- G. Communications/Alarm Equipment

- Fire alarm system ✓
Telephone (ext 3031) ✓

3. Date and nature of repairs or other remedial action:

4. Inspect every Tuesday.

5. Make sure Compounding's drum of die fume scrubber sludge is labeled, "Non-hazardous Waste."
- YAS

*This report was reconstructed on 9/18/98
to replace the missing original*

Omer Corniep

(Keep for three years from date of inspection.)

"envrhwtnsp_log.c"
Rev. October 29, 1997

Inspector name: OMER CORMIERDate Inspected (Tuesdays): 3/10/98 Time: 0900 AM Hrs.

DESCRIPTION of DRUM	LAB'D	DATE STARTED	TYPE OF WASTE	CLOSED (Y/N) If open, CLOSE IN	AMT.	CONDITION/COMMENTS	Est. WT. (Lbs.)
BLACK STEEL	YES	3/5/98	NON HAZ	YES	1/4		15
" "	YES	10/24/97	" "	YES	F		350
POLYETHYLENE	YES	10/28/97	HALOGENATED	YES	F		345
Maintenance	YES		aerosol can refill	YES	1/4		5
Quality Control lab	YES			YES	0		0
R & D Labs (all)	YES			YES	55 QTS	+ 7 DRUMS	2413
Subtotal pounds							3128
ONLY COMPLETE THIS SECTION ON THE FIRST TUESDAY OF EACH MONTH.							
Less subtotal from first Tuesday of last month							
Equals (net increase in hazardous waste)							
Is This greater than 2,200 pounds (Y/N)?							

* What is the earliest date? 10/24/98 Date to call for hazardous waste pickup (six months later) APRIL

GENERAL INSPECTION SCHEDULE & LOG

1. Types of problems to look for, which may harm human health or the environment:

A. Malfunctions
B. Deterioration
C. Operator Errors
D. Discharges

2. Inspection observations:

A. Monitoring Equipment

B. Safety Equipment
rubber gloves ☒
face shield ☒
grounding wires ☒
warning/caution signs ☒

C. Emergency Equipment

fire extinguisher ☒
eye wash bottles ☒
Spill Attack Pack ☒

D. Security Devices

fence/lock ☒

- E. Operating Equipment

spring-loaded funnel ☒
spark-proof bung wrench ☒
bucket ☒
dip stick ☒
inside light ☒
Ventilator turbine ☒

- F. Structural Equipment

cabinet floor, doors, walls ☒

- G. Communications/Alarm Equipment

Fire alarm system ☒
Telephone (ext 3031) ☒

3. Date and nature of repairs or other remedial action.

4. Inspect every Tuesday.

5. Make sure Compounding's drum of die fume scrubber sludge is labeled, "Non-hazardous Waste."
- YES

*This report was reconstructed on
9/18/98 to replace the missing original*

(Keep for three years from date of inspection.)

Omer Cormier

"envi/hw/inap_log.c"
Rev: October 29, 1997

Inspector name: OMER CORNIGER Date Inspected (Tuesday): 8/4/98 Time: 0900 am 1 pm.

DESCRIPTION of DRUM	LAB'D	DATE STARTED	TYPE OF WASTE	CLOSED (Y/N) If open, CLOSE IN	AMT.	CONDITION/COMMENTS	Est. WT. (Lbs.)
BLACK STEEL	YES	7/2/98	NON-HALO	YES	1/4		40
" "	YES	3/5/98	" "	YES	F		350
Polyethylene	YES	3/23/98	HALOGENATED	YES	3/4		335
Maintenance	YES		aerosol can resid	YES	1/4		5
Quality Control lab	YES			YES	3qts		6
R & D Labs (all)	YES			YES	79qts + 2 DRUMS		848
Subtotal pounds							1548
Less subtotal from first Tuesday of last month							1092
Equals (net increase in hazardous waste)							456
Is This greater than 2,200 pounds (Y/N)?							NO

ONLY COMPLETE THIS SECTION ON THE FIRST TUESDAY OF EACH MONTH.

* What is the earliest date? 3/5/98 Date to call for hazardous waste pickup (six months later) SEPT

GENERAL INSPECTION SCHEDULE & LOG

1. Types of problems to look for, which may harm human health or the environment:

- A. Malfunctions
B. Deterioration
C. Operator Errors
D. Discharges

2. Inspection observations:

- A. Monitoring Equipment

- B. Safety Equipment
rubber gloves ☒
face shield ☒
grounding wires ☒
warning/caution signs ☒

- C. Emergency Equipment
fire extinguisher ☒
eye wash bottles ☒
Spill Attack Pack ☒

- D. Security Devices
fence/lock ☒

- E. Operating Equipment

- spring-loaded funnel ☒
spark-proof bung wrench ☒
bucket ☒
dip stick ☒
inside light ☒
Ventilator turbine ☒

- F. Structural Equipment

- cabinet floor, doors, walls
- ☒

- G. Communications/Alarm Equipment

- Fire alarm system ☒
Telephone (ext 3031) ☒

3. Date and nature of repairs or other remedial action:

4. Inspect every Tuesday.

5. Make sure Compounding's drum of the fume scrubber sludge is labeled, "Non-hazardous Waste."
- YES

This report was reconstructed on 9/18/98
to replace the missing original

(Keep for three years from date of inspection.)

Omer Corniger

"envr/hw/insp_log.c"
Rev. October 29, 1997